



**Environmental  
Operations, Inc.**  
CLEARING THE WAY

February 5, 2018

Mr. Bruce Morrison  
Project Manager  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard  
Lenexa, KS 66219

RE: Progress Report  
Solutia – John F. Queeny Plant  
St. Louis, Missouri  
**EPA ID No. MOD 004 954 111**

RCRA



575285

Dear Mr. Morrison:

Environmental Operations, Inc. (EOI), on behalf of SWH Investments, is providing this Progress Report for the John F. Queeny Plant formerly owned by Solutia. We are providing this Progress Report in order accordance with the reporting requirements of the EPA Docket No. RCRA-07-2009-0015 Consent Order which became effective December 18, 2009.

Reporting Period

December 1, 2017 – January 31, 2018

Description of the work conducted pursuant to the Order during the reporting period.

- EOI had multiple communications with EPA pertaining to the development of the Statement of Basis.
- EOI met with EPA on December 21, 2017 in Lenexa for discussions on the Statement of Basis. Opus Development attended the meeting.
- EOI provided EPA draft input for the Statement of Basis on December 27, 2017.
- EOI received from EPA a draft Statement of Basis on January 4, 2018. EOI provided comments to EPA on the draft on January 5, 2018, and a conference call occurred on January 8, 2018 to further discuss. EPA provided a revised draft based on the discussion, with a follow up call on January 9, 2018.
- EPA provided by email on January 26, 2018 the final Statement of Basis, the Fact Sheet, Public Comment Notice, and the Administrative Record Index.
- EOI submitted the Vapor Intrusion Work Plan Implementation Report dated January 30, 2018 to EPA.

Environmental Engineering, Consulting, Remediation & Demolition  
1530 South 2<sup>nd</sup> Street St. Louis, Missouri 63104-4500 314.241.0900  
[www.environmentalops.com](http://www.environmentalops.com)

RECEIVED

FEB 07 2018

AWMD/RCAP

Mr. Bruce Morrison  
February 5, 2018

Estimate of the percentage of the project completed during the reporting period

- Not applicable (NA).

Description of the projects scheduled for completion during the reporting period which were not completed; statement explaining why and updated completion date.

- NA.

Copies of all data and sampling and test results and all other laboratory deliverables received by Respondent during the reporting period.

- NA

Description of the status of property transfer(s) during the reporting period.

- No change since last update.

Description of the projects and actions which are scheduled for the following reporting period.

- Semi-annual groundwater sampling will be conducted in March 2018.

If there are questions or concerns related to this Progress Report, please contact Larry Rosen, who can be reached by phone at (314) 480-4694, or via email at [larryr@environmentalops.com](mailto:larryr@environmentalops.com).

Respectfully submitted,  
ENVIRONMENTAL OPERATIONS, INC.



Lawrence C. Rosen, R.G.  
Senior Project Manager

Copy: Mr. Michael House/Solutia  
Ms. Christine Kump-Mitchell/MDNR  
Mr. Rich Nussbaum/ MDNR